

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-md-02865-LAK

This document relates to:

18-cv-07824; 18-cv-07827; 18-cv-07828;  
18-cv-07829; 19-cv-01781; 19-cv-01783;  
19-cv-01785; 19-cv-01788; 19-cv-01791;  
19-cv-01792; 19-cv-01794; 19-cv-01798;  
19-cv-01800; 19-cv-01801; 19-cv-01803;  
19-cv-01806; 19-cv-01808; 19-cv-01809;  
19-cv-01810; 19-cv-01812; 19-cv-01813;  
19-cv-01815; 19-cv-01818; 19-cv-01866;  
19-cv-01867; 19-cv-01868; 19-cv-01869;  
19-cv-01870; 19-cv-01871; 19-cv-01873;  
19-cv-01894; 19-cv-01896; 19-cv-01918;  
19-cv-01922; 19-cv-01926; 19-cv-01928;  
19-cv-01929; 19-cv-01931; 21-cv-05339.

**NOTICE OF DEFENDANT MICHAEL BEN-JACOB'S  
MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendant Michael Ben-Jacob, will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Defendant summary judgment in the above-captioned cases. In support of this motion, Defendant relies upon the accompanying Memorandum of Law, Statement of Uncontested Facts in Support of the Motion for Summary Judgment, dated May 10,

2024, and the Declaration of Thomas E.L. Dewey, dated May 10, 2024 and the exhibits attached thereto.

Dated: New York, New York  
May 10, 2024

Respectfully submitted,

DEWEY PEGNO & KRAMARSKY LLP

By: /s/ Thomas E.L. Dewey  
Thomas E.L. Dewey  
777 Third Avenue – 29<sup>th</sup> Floor  
New York, New York 10017  
Tel.: (212) 943-9000  
Fax: (212) 943-4325  
tdewey@dpklaw.com

KEKER, VAN NEST & PETERS LLP

By: /s/ Elliot R. Peters  
Elliot R. Peters  
Julia L. Allen  
633 Battery Street  
San Francisco, CA 94111  
Tel.: (415) 962-7188  
epeters@keker.com

*Attorneys for Defendant Michael Ben-Jacob*